## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	) CRIMINAL NO. 19-cr-10010-MLW
v.	)
BRIAN ORLANDELLA,	) )
Defendant.	)

## GOVERNMENT'S MOTION TO FACILITATE COURT ACCESS FOR OUT-OF-STATE VICTIM

Now comes the United States of America, by and through the undersigned Assistant United States Attorneys, and respectfully requests that the Court allow the sentencing hearing scheduled for Friday, August 5, 2022 at 2:00 p.m. to be broadcast by Zoom to the minor victim (or her family), should they wish to attend. As reason therefor, the government submits that Minor A's mother, who has submitted a victim impact statement in advance of the sentencing hearing, has been advised that the government will fund her travel to and lodging in Massachusetts so that she may attend the sentencing hearing in person if she so desires. However, given the date and timing of the sentencing hearing, the two-hour distance between Minor A's home and the closest major airport in Texas, and the recent high occurrence of flight delays and cancellations across the country, it is likely that such travel would necessarily span three days. Having already made such a voyage for the purpose of testifying at the trial in this matter, Minor A's mother believes that to do so again would present a hardship for her family, as she is the primary caretaker for five of her six children (the other of whom is now an adult).

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<sup>&</sup>lt;sup>1</sup> Understanding that the courtroom will be open to the public without restrictions on attendance (for example, related to Covid), the government is not asking the Court to broadcast the in-person hearing via a publicly accessible link.